



WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

RECORD RETENTION

POLICY/PROCEDURES

Policy Number: Board Policy 6-2025-04-1

_____ New Policy

_____ **X** _____ Revised

Date: June 4, 2025

Subject: Record Retention

A handwritten signature in black ink that reads "Michele Burns".

Michele Burns
Executive Director
CareerSource Okaloosa Walton

Board Approval

A handwritten signature in blue ink that reads "Michelle Crocker".

Date: 06/10/2025

Michelle Crocker
Board Chair
CareerSource Okaloosa Walton



Workforce Innovation and Opportunity Act (WIOA)

Record Retention

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Workforce Innovation and Opportunity Act (WIOA)

Record Retention

OF INTEREST TO

This policy applies to all CareerSource Okaloosa Walton employees and partners engaged in the handling, storage, retention, and destruction of records and information created or maintained on behalf of CareerSource Okaloosa Walton.

SUBJECT

Record Retention

PURPOSE

This policy establishes the guidelines for the retention, maintenance, and destruction of financial, personnel, client, and other official records of CareerSource Okaloosa Walton in compliance with federal, state, and local laws, including the Workforce Innovation and Opportunity Act (WIOA).

BACKGROUND

In the course of conducting its operations, CareerSource Okaloosa Walton creates, receives, and maintains a wide range of records containing sensitive, confidential, and business-critical information. Proper retention and management of these records are essential to comply with legal and regulatory requirements, support operational needs, and protect the privacy and confidentiality of individuals and entities associated with the organization. This policy establishes guidelines for the retention and appropriate disposal of records.

CareerSource Okaloosa Walton shall manage, maintain, and properly dispose of program and financial records in accordance with governing state and federal laws and regulations.

Rescinded Documents:

1. This policy replaces the Finance portion in the General Policies last updated September 2023.

Date / Revised: September 2023

REFERENCES

- 2 CFR § 200.334 - Record retention requirements.

- State Of Florida *General Records Schedule Gs1-SI For State And Local Government Agencies*, June 2023.
- Subrecipient Agreement, September 1, 2024.

POLICY PROVISIONS

PART I – RECORD RETENTION

A. SUBRECIPIENT AGREEMENT

1. Under the Subrecipient Agreement with FloridaCommerce, CareerSource Okaloosa Walton shall retain sufficient records demonstrating its compliance with the terms of the Agreement for a period of five (5) years from the date the audit report is issued, or five (5) state fiscal years after all reporting requirements are satisfied and final payments have been received, whichever period is longer, and shall allow Commerce, or its designee, CFO, or Auditor General access to such records upon request.
2. CareerSource Okaloosa Walton shall ensure that audit working papers are made available to FloridaCommerce, or its designee, CFO, or Auditor General upon request for a period of five (5) years from the date the audit report is issued, unless extended in writing by Commerce. In addition, if any litigation, claim, negotiation, audit, or other action involving the records has been started prior to the expiration of the controlling period as identified above, the records shall be retained until completion of the action and resolution of all issues which arise from it, or until the end of the controlling period as identified above, whichever is longer.
3. To ensure compliance with the terms of the Agreement, CareerSource Okaloosa Walton will maintain records for a minimum period of six (6) years from the date the audit report is issued, or six (6) state fiscal years after all reporting requirements are satisfied and final payments have been received, whichever period is longer.

B. FINANCIAL RECORDS RETENTION

1. The Finance Department maintains both electronic and physical financial records. Financial documents shall be retained as follows:
 - a. **Minimum Six Years Retention from Audit Resolution:**
 - (1) Audit Reports
 - (2) Chart of Accounts
 - (3) Leases
 - (4) Legal Matters
 - (5) Year-End Financial Statements
 - (6) General Ledger Year-End Trial Balance

- (7) Insurance Claims Records
- (8) Tax Returns
- (9) All the other financial records not specified above.

C. PERSONNEL RECORDS RETENTION

1. The designated staff person is responsible for maintaining personnel records, which include applications, evaluations, personnel action forms, telecommuting agreements, and other relevant documents. Personnel Records shall be retained as follows:

a. Minimum Six Years Retention from Personnel Exit Date:

- (1) Accident Reports/Claims
- (2) Legal Matters
- (3) Garnishments
- (4) Insurance Records
- (5) Settled Claims
- (6) Employment Applications
- (7) Personnel Records of Terminated Employees
- (8) Performance Evaluations
- (9) Personnel Action Forms

D. PROGRAM CLIENT RECORDS RETENTION

1. The designated staff shall maintain client records in both electronic systems and hard copy formats. The Program Client Records shall be retained as follows:

a. Minimum Six Years Retention from Program Completion:

- (1) All client records, including Individual Training Account (ITA) records and Support Service records are stored in an electronic database management system.
- (2) Applicant files

2. All recordkeeping will comply with Federal and State program guidance.

E. OTHER ADMINISTRATIVE RECORDS

1. The Administrative and Support Office Manager is responsible for maintaining non-financial and non-client organizational records. The Other Administrative Records shall be retained as follows:

- a. **Minimum Six Years Retention from Expiration Date or Completion:**

- (1) Minutes of Board Meetings
 - (2) Administrative Plan
 - (3) Five-Year Plan
 - (4) Continuity of Operations Plan
 - (5) Board Correspondence
 - (6) Procurement Records
 - (7) Executive Director Correspondence
 - (8) Internal Reports

PART II – RECORD DESTRUCTION

A. RECORD DESTRUCTION PROCEDURES

1. To ensure compliance with organizational policy and applicable legal requirements, this section outlines the procedures for the systematic identification, approval, and destruction of records. The following procedures are designed to safeguard sensitive information, promote efficient recordkeeping practices, and maintain accountability throughout the destruction process:
 - a. Record destruction shall be approved by the Executive Director or designee.
 - b. Records eligible for destruction shall be identified by designated staff.
 - c. Destruction shall be performed via an external shredding company.
 - d. A **Certificate of Destruction** must be issued for all destroyed records.
 - e. Any off-site storage records must be labeled with destruction dates.
 - f. All records in storage must be reviewed at least annually.

PART III – OTHER ADMINISTRATIVE FUNCTIONS

A. COMPLIANCE AND MONITORING

CareerSource Okaloosa Walton will regularly monitor record practices to ensure compliance with applicable laws and regulations.

B. POLICY REVIEW

This policy shall be reviewed periodically and updated as necessary to remain compliant with federal, state, and local requirements.

C. CONFIDENTIALITY

All data collected as a result of this policy is for official use only and should only be used in conducting official business. Refer to CareerSource Okaloosa Walton's policy on confidentiality for more information.

D. SUGGESTIONS FOR CHANGES OR WAIVER

1. Submit request for changes or waivers to this policy to the CareerSource Okaloosa Walton, 109 8th Avenue, Shalimar, Florida 32579, ATTN: Executive Director or Chief Operating Officer. Requests may also be e-mailed to:
 - a. The request for changes must include the suggested change and an explanation of how the change will improve the process.
 - b. Requests for waivers must include names, effective dates, case notes relating to the waiver, dollar amounts, etc.; and any other documentation to support the request.

E. ACTION REQUIRED

CSOW staff and partners in Okaloosa and Walton Counties will implement this Local Policy upon receipt.

F. TRAINING HOURS: 45 minutes or the time attested to by the Program Manager/Coordinator.

SIGNATURE CERTIFICATE



REFERENCE NUMBER

63850B4E-EFFA-4799-9368-B043F23BB451

TRANSACTION DETAILS

Reference Number
63850B4E-EFFA-4799-9368-B043F23BB451

Transaction Type
Signature Request

Sent At
06/10/2025 11:18 AM CDT

Executed At
06/10/2025 04:27 PM CDT

Identity Method
email

Distribution Method
email

Signed Checksum
f82cd9819ddde956313c864aaf1f05779fbe193269d12384ca96a45827f664f9

Signer Sequencing
Disabled

Document Passcode
Disabled

DOCUMENT DETAILS

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Record Retention 6-2025-04-1

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Record_Retention_6-2025-04-1.pdf

Pages
8 pages

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application/pdf

File Size
1.34 MB

Original Checksum
e7ae87d872b1c9b1f35de1a3d4ffb254e28ec7426cf8aa39d3cd345813713cac

SIGNERS

SIGNER	E-SIGNATURE	EVENTS
Name Michelle Crocker	Status signed	Viewed At 06/10/2025 04:27 PM CDT
Email mcrocker@firstnationgroup.com	Multi-factor Digital Fingerprint Checksum 25d11eda87fd7a4a75ef59bca549d7b7ebd6bc84e84d4e6ae3dae850c365f6a1	Identity Authenticated At 06/10/2025 04:27 PM CDT
Components 2	IP Address 198.233.131.154	Signed At 06/10/2025 04:27 PM CDT
	Device Chrome via Windows	
	Typed Signature 	
	Signature Reference ID 9906CF71	

AUDITS

TIMESTAMP	AUDIT
06/10/2025 11:18 AM CDT	Sue Berntsen (sberntsen@careersourceow.com) created document 'Record_Retention_6-2025-04-1.pdf' on Microsoft Edge via Windows from 35.169.110.255.
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